

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
International Settlement Rates)	IB Docket No. 96-261
)	
Petition for Waiver of the Benchmark)	
Settlement Rate for Guyana)	

To: The Commission

OPPOSITION TO APPLICATION FOR REVIEW

WorldCom, Inc. ("WorldCom") hereby submits its Opposition to Atlantic Tele-Network, Inc.'s ("ATN") Application for Review of the order issued November 16, 2001, denying ATN's petition for waiver of the benchmark settlement rate for the U.S.-Guyana route.¹ In its Petition, ATN requested that the Commission waive the benchmark settlement rate for the U.S. - Guyana route for five years or until Guyana's teledensity reaches 23, whichever occurs sooner.²

The Chief of the Telecommunications Division of the International Bureau (the "Bureau"), acting under delegated authority, denied ATN's Petition after concluding that "ATN has not persuasively demonstrated that a waiver of the transition deadline would be in the public interest."³ The Bureau further noted that "we do not find ATN's contentions persuasive that

¹ *Atlantic Tele-Network, Inc. Request for a Waiver of the Benchmark Settlement Rate on the U.S.-Guyana Route*, Order, DA 01-2658 (Int'l Bureau)("Order").

² *International Settlement Rates*, IB Docket No. 96-261, Petition for Waiver of the Benchmark Settlement Rate for Guyana of Atlantic Tele-Network, Inc. (filed July 6, 2001)("Petition").

³ *Order* at ¶ 6.

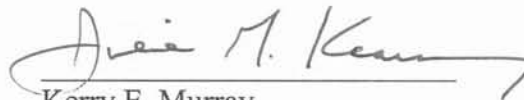
there is good cause to waive the transition deadline for the U.S.-Guyana route.⁴ In addition, the Bureau evaluated ATN's Petition by applying the waiver criteria established in the *Benchmarks Order*.⁵

WorldCom agrees with the Bureau's reasons for denying ATN's Petition under Section 1.3 of the Commission's rules and also finding that ATN has failed to meet the waiver criteria set forth in the *Benchmarks Order*. The Commission's *Benchmarks Order* has been highly successful in driving lower, nondiscriminatory settlement rates, to the benefit of U.S. consumers. Granting ATN's Petitions would erode these benefits, and would be inconsistent with the Commission's rules and policies. Accordingly, the Commission should deny ATN's Application for Review and its request that the Commission stay the effect of the Order until the review has been completed.

Respectfully submitted,

WORLDCOM, INC.

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Dated: January 2, 2002

⁴ Order at ¶ 10.

⁵ *In the Matter of International Settlement Rates*, 12 FCC Rcd 19806 (1997) ("*Benchmarks Order*"), *aff'd sub nom. Cable & Wireless P.L.C. v. FCC et al.*, C.A.D.C. No. 97-1612, January 12, 1999.

CERTIFICATE OF SERVICE

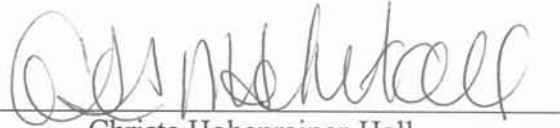
The undersigned, an employee of WorldCom, Inc., hereby certifies that the foregoing document was mailed this date by First Class U.S. mail, postage prepaid, or was hand-delivered*, to the following:

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January 2, 2002